

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 2:25-cv-01963

Hon. Michael E. Farbiarz

**NOTICE OF MOTION
FOR ADMISSION *PRO
HAC VICE* OF CONOR T.
FITZPATRICK**

PLEASE TAKE NOTICE that as soon as counsel may be heard, but no later than the regular April 21, 2025 motion day, the undersigned counsel for proposed *amicus curiae* Foundation for Individual Rights and Expression hereby moves before the Honorable Michael E. Farbiarz, United States District Judge at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ for an Order pursuant to L. Civ. R. 101.1(c), admitting Conor T. Fitzpatrick as counsel *pro hac vice* in the above-captioned matter;

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the undersigned will rely upon the Certifications of Conor T. Fitzpatrick and Greg H.

Greubel, as well as the attached Certificates of Good Standing. A proposed Order is attached hereto.

Dated: March 21, 2025

Respectfully Submitted,

/s/ Greg H. Greubel

Conor T. Fitzpatrick*
FOUNDATION FOR INDIVIDUAL
RIGHTS AND EXPRESSION
700 Pennsylvania Ave. SE, Ste. 340
Washington, DC 20003
(215) 717-3473
conor.fitzpatrick@thefire.org

Greg H. Greubel
(NJ Bar No. 171622015)
FOUNDATION FOR INDIVIDUAL
RIGHTS AND EXPRESSION
510 Walnut St., Ste. 900
Philadelphia, PA 19106
(215) 717-3473
greg.greubel@thefire.org

Counsel for Amicus Curiae

*Pro hac vice application pending